



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278

December 10, 2024

**BY ECF**

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Gregory Gumucio and Michael Anderson, et al.*, 23 Cr. 595 (JPC)

Dear Judge Cronan:

The Government writes, with consent from defendants Gregory Gumucio and Michael Anderson, to request adjournments of approximately three months of their sentencings, currently scheduled for January 16, 2025 and January 9, 2025, respectively. The Government acknowledges that this is a significant adjournment request, but makes this request because the undersigned Assistant is currently the only Assistant assigned to this complex matter, and has other case demands in January and February 2025, including several filing deadlines throughout January 2025 and a four-week-long trial beginning on February 10, 2025.<sup>1</sup> Based on discussions with defense counsel, the Government understands that Gumucio is available on April 1 (in the afternoon), April 2 (before 4 p.m.), April 3, and April 4, 2025. The Government further understands that Anderson is available for sentencing between April 9 and 11, 2025.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/  
Rushmi Bhaskaran  
Assistant United States Attorney  
(212) 637-2439

cc: Defense Counsel (by ECF)

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<sup>1</sup> The undersigned Assistant also expects to be out of the District during the week of March 24, 2025.